

# **EXHIBIT 2**

1 MORGAN, LEWIS & BOCKIUS LLP  
2 KENT M. ROGER, State Bar No. 95987  
3 DIANE L. WEBB, State Bar No. 197851  
MICHELLE PARK CHIU, State Bar No. 248421  
3 JASON B. ALLEN, State Bar No. 251759  
One Market, Spear Street Tower  
4 San Francisco, CA 94105-1126  
Tel: 415.442.1000  
5 Fax: 415.442.1001  
E-mail: [kroger@morganlewis.com](mailto:kroger@morganlewis.com)  
[dwebb@morganlewis.com](mailto:dwebb@morganlewis.com)  
[mchiu@morganlewis.com](mailto:mchiu@morganlewis.com)  
[jason.allen@morganlewis.com](mailto:jason.allen@morganlewis.com)

8 Attorneys for Defendants  
HITACHI, LTD.  
9 HITACHI DISPLAYS, LTD.  
HITACHI ASIA, LTD.  
10 HITACHI AMERICA, LTD.  
HITACHI ELECTRONIC DEVICES (USA), INC.  
11

12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN FRANCISCO DIVISION

16 IN RE CATHODE RAY TUBE (CRT)  
17 ANTITRUST LITIGATION

Case No. C07-5944 SC

**MDL NO. 1917**

Judge: Hon. Samuel Conti

Special Master: Hon. Charles A. Legge (Ret.)

20 This Document Relates To:  
21  
22 ALL ACTIONS

**DECLARATION OF TETSURO  
YOKOO IN SUPPORT OF THE  
HITACHI DEFENDANTS'  
EVIDENTIARY PROFFER**

23 **DECLARATION OF TETSURO YOKOO**

24 I, Tetsuro Yokoo, declare:

25 1. I am Tetsuro Yokoo of Hitachi, Ltd. ("HTL"). I make this declaration in support  
26 of the Hitachi Defendants' proffer. I have personal knowledge of the facts contained in this  
27 declaration, except for those, if any, based on information and belief, and, if called as a witness,  
would and could competently testify to them.

28 DB2/22062125.5

MDL 1917

DECLARATION OF TETSURO YOKOO IN SUPPORT OF  
THE HITACHI DEFENDANTS' EVIDENTIARY PROFFER

1           2. I am Senior Legal Manager of the Business Strategy and Development Department  
2 of the Consumer Business Division of Hitachi, Ltd. As a result of my position within HTL, I am  
3 familiar with HTL's historical business relating to televisions containing color picture tubes  
4 ("CPT tubes") and computer monitors containing color display tubes ("CDT tubes"). I have been  
5 employed by HTL since 1982.

6           3. HTL's Display Group sold and manufactured CDT tubes and CPT tubes. In  
7 October 2002, the Display Group of HTL was spun off to HDP. As a result of the October 2002  
8 spin-off, HDP retains documents and information relating to HTL's manufacturing and sale of  
9 CDT tubes and CPT tubes.

10           10. **I. CDT Computer Monitors**

11           11. I am informed and believe, based on my review of HTL's business records, that  
12 HTL manufactured CDT computer monitors beginning in December 1987.

13           13. I am informed and believe, based on my understanding of HTL's business history,  
14 that HTL first began selling CDT computer monitors no earlier than December 1987.

15           15. I am informed and believe that HTL's CDT computer monitor customers were  
16 located in Japan, Europe, and the United States.

17           17. I am informed and believe, based on my review of HTL's business records, that  
18 HTL ceased manufacturing CDT computer monitors in September 2000.

19           19. I am informed and believe, based upon my review of HTL's business records, that  
20 HTL's final CDT computer monitor sale to the United States took place in July 2000. HTL  
21 continued to sell repair parts for CDT computer monitors to customers in the United States until  
22 March 2001. Attached hereto as Exhibit 1 is a true and correct copy of HTL's CDT computer  
23 monitor sales data, Bates labeled HTC-CRT00000020, which reflects HTL's final CDT computer  
24 monitor part sale to the United States in March 2001.

25           25. I am informed and believe, based on my understanding of HTL's business history,  
26 that HTL's final CDT computer monitor sale worldwide would have taken place no later than  
27 January 2002.

28

## II. CPT Televisions

10. I am informed and believe, based on my review of HTL's business records, that HTL began manufacturing and selling CPT televisions no later than 1968.

11. I am informed and believe that HTL's CPT television customers were located in Europe, Australia, Asia, and Africa.

12. I am informed and believe that HTL did not sell CPT televisions to customers within the United States.

13. I am informed and believe, based upon my review of HTL's business records, that HTL ceased manufacturing CPT televisions in October 2000.

14. I am informed and believe, based upon my understanding of HTL's business history, that HTL's final CPT television sale worldwide took place in approximately 2001, after it ceased manufacturing CPT televisions.

I declare under the penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed this 6 th day of December, 2010, in Tokyo, Japan.

Tetsuro Yokoo

**EXHIBIT 1**  
**TO DECLARATION OF TETSURO YOKOO**

| Country | Customer | Received by | Logistics # | Receiving # | Product Code | Product Abbrev. | Tax Category | Price Quote | Payment Terms | Volume | Unit Price (foreign country) | Accts. Rec'ble Rate | Unit Price (JY) | Sales Income | Production Cost of Sales | Sales Cost Ratio | Sales Profit | Profit Ratio |
|---------|----------|-------------|-------------|-------------|--------------|-----------------|--------------|-------------|---------------|--------|------------------------------|---------------------|-----------------|--------------|--------------------------|------------------|--------------|--------------|
| 304     | 20000    | 1111        | 3069        | 08          | 6464900000   | 0880057         | 4            | FOB         | 4 TB 070      | 100    |                              |                     | 21              | 2,100        | 267                      |                  | 1,621        |              |
|         |          |             |             | *           |              |                 |              |             |               | 100    |                              |                     |                 | 2,100        | 267                      | 12.7             | 1,621        | 77.2         |